

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

RELATIVITY MEDIA, LLC, *et al.*,

Debtors.¹

NETFLIX, INC.,

Plaintiff-Counterclaim Defendant,

v.

RELATIVITY MEDIA, LLC and RML
DISTRIBUTION DOMESTIC, LLC

Defendants-Counterclaim Plaintiffs.

Chapter 11
Case No. 18-11358 (MEW)
(Jointly Administered)

Adv. Proc. No. 18-01552 (MEW)

NOTICE OF SUBSTITUTION OF COUNSEL

PLEASE TAKE NOTICE that, in furtherance of the Court's ruling at the hearing held before the Court on July 3, 2018, which was subsequently memorialized in the Court's July 6, 2018 bench decision [Bankruptcy Docket No. 312] and order [Bankruptcy Docket No. 313], the firm of Winston & Strawn LLP ("**Winston**") hereby withdraws as attorneys of record for the Debtor-Defendants in the above-captioned adversary proceeding and in connection with the *Debtors' Motion Pursuant to 11 U.S.C. §§ 105 and 365 and Fed. R. Bankr. P. 6006 for Entry of an Order Approving Assumption of Executory Contracts with Netflix, Inc.* [Bankruptcy Docket No. 213] filed in the above-captioned bankruptcy case (together, the "**Netflix Matters**"). For the sake of clarity, Winston remains as counsel to the Debtors in the above-captioned bankruptcy

¹ Each of the Debtors in the above-captioned jointly administered chapter 11 cases and their respective tax identification numbers are set forth (a) in the *Order (A) Authorizing the Joint Administration of their Chapter 11 Cases and (B) Waiving Requirements of Section 342(C)(1) of the Bankruptcy Code and Bankruptcy Rule 2002(n)* [Docket No. 5] and (b) at <https://cases.primeclerk.com/relativity>. The location of Relativity Media, LLC's corporate headquarters and the Debtors' service address is: 9242 Beverly Blvd #300, Beverly Hills, CA 90210.

case as and to the extent set forth in the Court's July 6, 2018 order [Bankruptcy Docket No. 313]; and

PLEASE TAKE FURTHER NOTICE that, subject to the Court's approval below and pursuant to Local Bankruptcy Rule 2090-1(e), the firm of Willkie Farr & Gallagher LLP, 787 Seventh Avenue, New York, New York 10019, shall be substituted as attorneys of record for the undersigned Debtor-Defendants in the Netflix Matters in the place of Winston.

Dated: July 11, 2018

RELATIVITY MEDIA, LLC, *et al.*

By: /s/ Colin M. Adams
Colin M. Adams
*Chief Restructuring Officer to the
Debtors and Debtors in Possession*

WILLKIE FARR & GALLAGHER LLP

By: /s/ Antonio Yanez, Jr.
Antonio Yanez, Jr.
Jeffrey B. Korn
Matthew Freimuth
787 Seventh Avenue
New York, New York 10019
Telephone: (212) 728-8000
Emails:
ayanez@willkie.com
jkorn@willkie.com
mfreimuth@willkie.com

*Proposed Successor Attorneys for
Relativity Media, LLC and RML
Distribution Domestic, LLC, as and
to the extent set forth above.*

WINSTON & STRAWN LLP

By: /s/ Michael S. Elkin
Michael S. Elkin
Thomas P. Lane
Daniel N. Guisbond
200 Park Avenue
New York, NY 10166
Telephone: (212) 294-6700
Emails:
melkin@winston.com
tlane@winston.com
dguisbond@winston.com

*Withdrawing Attorneys for Relativity
Media, LLC and RML Distribution
Domestic, LLC, as and to the extent set
forth above.*

SO ORDERED this ____ day of July, 2018

HONORABLE MICHAEL E. WILES
UNITED STATES BANKRUPTCY JUDGE